

**WENDY SNEAD and EDWARD
MOREDOCK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CORECIVIC OF TENNESSEE, LLC
f/k/a CORRECTIONS CORPORATION
OF AMERICA,

Defendant.**

SUPPLEMENTAL STATEMENT OF UNDISPUTED MATERIAL FACTS

Case 3:17-cv-00949 Document 92 Filed 03/13/20 Page 1 of 5 PageID #: 1348

RESPONSE:

3. A true and correct copy of Policy 14-5, Inmate/Resident Grievance Procedures is attached to the Second Declaration of John Rychen as Exhibit C. (*Id.* ¶ 5).

RESPONSE:

4. A true and correct copy of Policy 14-6, Inmate/Resident Property is attached to the Second Declaration of John Rychen as Exhibit D. (*Id.* ¶ 6).

RESPONSE:

5. A true and correct copy of Policy 11-1, Food Service Operations is attached to the Second Declaration of John Rychen as Exhibit E. (*Id.* ¶ 7).

RESPONSE:

6. True and correct copies of Policy 17-101, Reception and Orientation and relevant portions of the Inmate Handbook are attached to the Second Declaration of John Rychen as collective Exhibit F. (*Id.* ¶ 8).

RESPONSE:

7. A true and correct copy of Policy 16-100, Inmate Access to Telephones is attached to the Second Declaration of John Rychen as Exhibit G. (*Id.* ¶ 9).

RESPONSE:

8. A true and correct copy of Policy 10-1, Segregation/Restrictive Housing Unit Management is attached to the Second Declaration of John Rychen as Exhibit H. (*Id.* ¶ 10).

RESPONSE:

9. Customs at the Metro-Davidson County Detention Facility (“Detention Facility”) mandate that CoreCivic employees refrain from retaliating against inmates and that CoreCivic employees provide inmates clean bedding and clothing, food, medical treatment, showers, telephone privileges, and appropriate housing placement. (*Id.* ¶ 11).

RESPONSE:

10. CoreCivic employees did not retaliate against inmates who complained about scabies and did not deny inmates clean bedding and clothing, food, medical treatment, showers, or telephone privileges and did not inappropriately place inmates in restrictive housing. (*Id.* ¶¶ 12-17).

RESPONSE:

11. All medical providers at the Detention Facility initially were required to complete 44 hours of training in 2017. This training covered such topics as cardiopulmonary resuscitation, the code of ethics, communication, emergency plans, facility safety, female offenders, first aid, infection control, information security, inmate grievances, inmate management, inmate rights, the Prison Rape Elimination Act, suicide prevention, and use of force. (Declaration of Barton Wilson ¶ 5).

RESPONSE:

12. Medical providers then were required to complete 40 hours of on-the-job (“OJT”) training, which was conducted by an experienced member of the medical team and overseen by the health services administrator. The following were among the OJT topics: chronic care clinics, completing forms, computer logs, emergency procedures, equipment and supplies, infection control, inmate release procedures, inmate supervision, intake procedures, laboratory procedures, medications, pill call procedures, sick call requests, treatment protocols, and universal precautions. (*Id.* ¶ 6).

RESPONSE:

13. Medical providers also were required to complete training on Allscripts, which is CoreCivic’s electronic medical record technology, and the following Lippincott E-Learning Courses: 12-lead electrocardiogram, automated external defibrillation assessment techniques, blood glucose monitoring documentation, hand hygiene, handheld resuscitation bag and mask use, IV administration set priming, IV bag preparation, IV catheter insertion, IV catheter removal, oxygen administration, pulse oximetry, the Prison Rape Elimination Act, safe medication administration practices, seizure management standard precautions, triage in the emergency department, and tuberculin skin testing. (*Id.* ¶ 7).

RESPONSE:

14. Medical providers also were required to undergo annual training after the initial training. The annual training lasted 40 hours and covered such topics as cardiopulmonary

resuscitation, the code of ethics, communication, emergency plans, facility safety, first aid, infection control, information security, and suicide prevention along with additional training on Allscripts and Lippincott E-Learning Courses. (*Id.* ¶ 8).

RESPONSE:

Respectfully submitted,

/s/ Erin Palmer Polly
Joseph F. Welborn, III (#15076)
Erin Palmer Polly (#22221)
Butler Snow LLP
The Pinnacle at Symphony Place
150 Third Avenue, South, Suite 1600
Nashville, Tennessee 37201
(615) 651-6700
(615) 651-6701

*Counsel for Defendant CoreCivic of
Tennessee, LLC*

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this March 13, 2020, on the following:

W. Gary Blackburn
Bryant Kroll
The Blackburn Firm, PLLC
213 Fifth Avenue North, Suite 300
Nashville, Tennessee 37219

Jeffery S. Roberts
Jeff Rogers & Associates, PLLC
213 Fifth Avenue North, Suite 300
Nashville, Tennessee 37219

R. Joshua McKee
The McKee Law Firm
213 Fifth Avenue North, Suite 300
Nashville, Tennessee 37219

/s/ Erin Palmer Polly

52120565.v1